

THE CHAFFIN LAW FIRM

A Professional Corporation

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February 9, 2016

Honorable Ortie D. Smith
United States District Judge
Western District of Missouri

BY FAX 816-512-5658

Re: Ian Pollard v. Remington Arms Company, LLC, et al
C.A. No. 13-0086-CV-W-ODS

Dear Judge Smith:

At the conclusion of our phone conference last Thursday you advised I should direct a letter to you concerning production of certain materials and information sought by Objector Rodney Townsend who is a member of Settlement Class B(1), a/k/a the XMP sub class.

As His Honor is aware we have objected to the settlement inasmuch as: (1) it provides no relief to the XMP sub class given that they already had the right to exchange their old XMP trigger for a new one; (2) utilizes an entirely ineffective notice for the entire class; and, (3) class counsel attorney fees are wholly out of balance with the actual value of the settlement to the class. In order to more fully expose the inadequacy of the settlement we have requested additional information and documentation from Class Counsel and Remington none of which is burdensome or oppressive in the least.

The following information and materials have been sought from Class Counsel by Objector: (1) A list of claims made and dates of said claims by members of the XMP sub class; (2) A list of claims made and dates of such claims by members of the Trigger Connector sub class; (3) A chronological list with number of inquiries made by all class members including breakdown by sub class if available; (4) Documentation as to the total amount of funds authorized and spent on all notice efforts by the claims administrator with a breakdown as to how such funds have been expended.

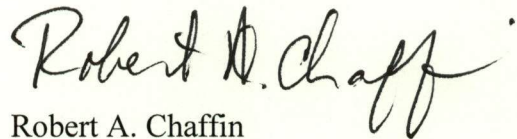
The following information and materials have been requested from Remington: (1) A list with the number of XMP M700's returned each month pursuant to the original recall; (2) Documentation as to the amount expended by Remington to provide notice of the original recall including a breakdown of how such funds have been expended; (3) Documentation as to the total cost of the original XMP recall as well as the cost of repair per rifle returned pursuant to the recall.

Honorable Ortie D. Smith
February 9, 2016
Page Two

All of the information requested by Objector is highly relevant to the proceedings and in no way oppressive or burdensome for either Class Counsel or Remington to provide. Transparency should be the goal of all concerned with any consumer class action including both Class Counsel and Remington in our case rather than an approach of concealing critical facts from class members. I have personally been involved with Model 700 injury and death cases for the past 30 years. I have never before participated in any form as an objector or counsel to an objector in a class action settlement nor has Mr. Townsend. All of the requests being made here are purely in good faith and intended solely to benefit the XMP sub class as well as all class members in general. All of the requests made here are clearly within the judgment and discretion of His Honor to grant or deny and as such we do not feel any lengthy citations are in order.

Sincerely,

THE CHAFFIN LAW FIRM

A handwritten signature in black ink that reads "Robert A. Chaffin". The signature is written in a cursive, flowing style with a large initial "R" and "C".

Robert A. Chaffin

RAC:pb

HP LaserJet 300 colorMFP M375nw

Fax Confirmation

HP FaxChaffin Law Firm
7139525972
Feb-9-2016 5:24PM

Job	Date	Time	Type	Identification	Duration	Pages	Result
647	2/ 9/2016	5:23:14PM	Send	18165125658,828	1:25	3	OK

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FAX DATA TRANSMITTAL

2-9-16

DATE

TO:

Honorable Artie D. Smith

FROM:

Mr. Robert Chaffin

RE:

CA NO. 13-0086-CV-W-005 Adlard v
Remington

SENT BY:

ph

3

PAGES INCLUDING THIS PAGE.

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